

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: WAVE 1 CASES	

**MOTION TO EXCLUDE THE OPINIONS AND
TESTIMONY OF DUANE B. PRIDDY, PH.D.**

Defendants Ethicon, Inc. and Johnson & Johnson (“Ethicon”) move to exclude the opinions and testimony of Duane B. Priddy, Ph.D. Dr. Priddy’s proposed opinion testimony is unreliable and irrelevant under the standard set forth in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993). Ethicon incorporates its Memorandum in Support of Motion to Exclude the Opinions and Testimony of Duane B. Priddy, Ph.D., and also the following exhibits:

1. List of cases to which this motion applies, attached as Exhibit A.
2. Rule 26 Expert Report of Duane B. Priddy, Ph.D., attached as Exhibit B.
3. Excerpts from the deposition of Duane B. Priddy, Ph.D. taken March 8, 2016, attached as Exhibit C.
4. E. de la Rie, *Polymer Stabilizers: A Survey with Reference to Possible Applications in the Conservation Field*, 33 *Studies in Conservation* (1988) 9-22, attached as Exhibit D.
5. ASTM-3895-14, attached as Exhibit E.

WHEREFORE, FOR THESE REASONS and as more fully set forth in Ethicon's supporting memorandum of law, Ethicon respectfully requests that this Court enter an order granting Ethicon's Motion to Exclude the Opinions and Testimony of Duane B. Priddy, Ph.D.

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

/s/ David B. Thomas

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CERTIFICATE OF SERVICE

I certify that on April 20, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

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